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REMARKS**OBJECTIONS TO THE DRAWINGS**

The Office Action at page 2 objects to the drawings stating:

The drawings are objected to because the drawings elements are not clearly differentiated in that two drawing elements have the same names, both elements 318 and 322 are identified as "structural element identifier."

That is, the Office Actions asserts that two elements having the same names in a single view of the drawings cannot have different reference numbers. The law governing the objection in the Office Action, however, is 37 CFR § 1.84(p)(4) requiring, "The same part of an invention appearing in more than one view of the drawing must always be designated by the same reference character...." Applicants respectfully note in response that the structural element identifier (318) and structural element identifier (322) do not depict the same part of the invention in each pertinent view of the drawings. In each pertinent view of the drawings, the structural element identifier (318) is depicted inside the grammar element (316) to clearly indicate that the structural element identifier (318) is the structural element identifier (318) of the grammar element (316). In the drawings, the structural element identifier (322) is depicted inside the structured document (306) to clearly indicate that the structural element identifier (322) is the structural element identifier (322) of the structured document (306). The drawings, therefore, clearly distinguish the structural element identifier (318) from the structural element identifier (322). In addition to the drawings, the paragraph beginning at page 12, line 19, of the specification that describes the drawings also distinguishes the structural element identifier (318) from the structural element identifier (322). Because the drawings comply with 37 CFR § 1.84(p)(4), Applicants traverse the objection to the drawings and respectfully decline to amend the drawings at this time.

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CLAIM REJECTIONS – 35 U.S.C. § 102 OVER RAMAN

Claims 1-7, 9-15, and 17-23 stand rejected under 35 U.S.C § 102(e) as being anticipated by Raman (U.S. Patent No. 5,748,186). To anticipate claims 1-7, 9-15, and 17-23 under 35 U.S.C. § 102(e), two basic requirements must be met. The first requirement of anticipation is that Raman must disclose each and every element as set forth in Applicants' claims. The second requirement of anticipation is that Raman must enable Applicants' claims. Raman does not meet either requirement and therefore does not anticipate Applicants' claims.

**Raman Does Not Disclose Each and Every Element
Of The Claims Of The Present Application**

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). As explained in more detail below, Raman does not disclose each and every element of claim 1, and Raman therefore cannot be said to anticipate the claims of the present application within the meaning of 35 USC 102.

Independent claim 1 of the present application claims:

1. A method for creating a presentation document, the method comprising:

creating, in dependence upon an original document, a structured document comprising one or more structural elements; and

creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document.

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Raman Does Not Disclose Creating A Presentation Grammar For The Structured Document, Wherein The Presentation Grammar For The Structured Document Includes Grammar Elements Each Of Which Includes A Structural Element Identifier For At Least One Structural Element Of The Structured Document

The second element of claim 1 claims “creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document.” Regarding the second element of claim 1, the Office Action states that Raman at column 6, lines 29-31, and claims 14 and 22, discloses:

creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document. (See, Raman, col. 6, lines 29-31, teaching that control signals can include recognized speech, which inherently includes a grammar to be recognized. Further, see, Raman, claims 14 and 22, teaching interactivity of the system accomplished using only speech.)

That is, the Office Action takes the position that Raman at column 6, lines 29-31, claim 14, and claim 22 discloses the second element of claim 1. Applicants respectfully note in response, however, that what Raman at column 6, lines 29-31, in fact discloses is:

Control signals or events can include key strokes, mouse clicks, or other user input, including recognized speech. Events can have associated priorities. An event with a higher priority may preempt the processing of lower priority events.

That is, Raman at column 6, lines 29-31, discloses that control signals or events may be implemented as user input and that events may have associated priorities. Raman’s disclosure of control signals or events that may be implemented as user input is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural

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element of the structured document as claimed in the present application. In fact, Raman at column 6, lines 29-31, does not even mention ‘grammar,’ ‘presentation grammar,’ ‘grammar elements,’ or ‘creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document.’ Because Raman does not disclose each and every element and limitation of Applicants’ claims, Raman does not anticipate Applicants’ claims, and the rejections should be withdrawn.

Turning now to claim 14 of Raman, Applicants respectfully note in response that what Raman at claim 14 in fact discloses is:

14. An interactive system for presenting source information, comprising:
 - a converter configured to convert electronically encoded data representing the source information to a common intermediate representation of the source information;
 - a presenter configured to convert the common intermediate representation into a presentation of the source information to a user;
 - an input device configured to enter user commands to select one or more of at least two modalities in which the source information is presentable; and
 - an interactive interface configured to receive a command entered on the input device and to issue a control signal representing the received command to the presenter, responsive to which the presenter controls the presentation of the source information in the selected one or more of the at least two modalities.

That is, Raman at claim 14 discloses an interactive system for presenting source information that includes an interactive interface for issuing control signals to a presenter based on input commands. Raman’s interactive system for presenting source information that includes an interactive interface for issuing control signals to a presenter based on input commands is not creating a presentation grammar

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for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at claim 14 does not even mention ‘grammar,’ ‘presentation grammar,’ ‘grammar elements,’ or ‘creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document.’ Because Raman does not disclose each and every element and limitation of Applicants’ claims, Raman does not anticipate Applicants’ claims, and the rejections should be withdrawn.

Turning now to claim 22 of Raman, Applicants respectfully note in response that what Raman at claim 22 in fact discloses is:

22. An interactive system according to claim 14, wherein:

the input device includes a speech input unit;
the at least two modalities include an aural presentation modality; and
with the aural presentation modality selected, interactivity between the interactive system and the user is accomplished using only speech.

That is, Raman at claim 22 discloses an interactive system for presenting source information in which the interactivity is accomplished using speech. Raman’s interactive system for presenting source information in which the interactivity is accomplished using speech is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at claim 22 does not even mention ‘grammar,’ ‘presentation grammar,’ ‘grammar elements,’ or ‘creating a presentation grammar for the structured document, wherein the presentation

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grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document.' Because Raman does not disclose each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

**Raman Does Not Enable Each and Every Element
Of The Claims Of The Present Application**

Not only must Raman disclose each and every element of the claims of the present application within the meaning of *Verdegaal* in order to anticipate Applicants' claims, but also Raman must be an enabling disclosure of each and every element of the claims of the present application within the meaning of *In re Hoeksema*, 399 F.2d 269, 158 USPQ 596 (CCPA 1968). In *Hoeksema*, the claims were rejected because an earlier patent disclosed a structural similarity to the applicant's chemical compound. The court in *Hoeksema* stated: "We think it is sound law, consistent with the public policy underlying our patent law, that before any publication can amount to a statutory bar to the grant of a patent, its disclosure must be such that a skilled artisan could take its teachings in combination with his own knowledge of the particular art and be in possession of the invention." *Id.*, 399 F.2d at 273, 158 USPQ at 600. The meaning of *Hoeksema* for the present case is that unless Raman places Applicants' claims in the possession of a person of ordinary skill in the art, Raman is legally insufficient to anticipate Applicants' claims under 35 U.S.C. § 102.

Independent claim 1 of the present application claims:

1. A method for creating a presentation document, the method comprising:
 - creating, in dependence upon an original document, a structured document comprising one or more structural elements; and
 - creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural

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element identifier for at least one structural element of the structured document.

Raman Does Not Place In The Possession Of A Person Of Ordinary Skilled In The Art Creating A Presentation Grammar For The Structured Document, Wherein The Presentation Grammar For The Structured Document Includes Grammar Elements Each Of Which Includes A Structural Element Identifier For At Least One Structural Element Of The Structured Document

The second element of claim 1 claims “creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document.” Regarding the second element of claim 1, the Office Action states that Raman at column 6, lines 29-31, and claims 14 and 22, discloses:

creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document. (See, Raman, col. 6, lines 29-31, teaching that control signals can include recognized speech, which inherently includes a grammar to be recognized. Further, see, Raman, claims 14 and 22, teaching interactivity of the system accomplished using only speech.)

That is, the Office Action takes the position that Raman at column 6, lines 29-31, claim 14, and claim 22 discloses the second element of claim 1. Applicants respectfully note in response, however, that what Raman at column 6, lines 29-31, in fact discloses is:

Control signals or events can include key strokes, mouse clicks, or other user input, including recognized speech. Events can have associated priorities. An event with a higher priority may preempt the processing of lower priority events.

That is, Raman at column 6, lines 29-31, discloses that control signals or events may be implemented as user input and that events may have associated priorities. Raman’s disclosure of control signals or events that may be implemented as user

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input is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at column 6, lines 29-31, does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document.' Because Raman does not place in the possession of a person of ordinary skilled in the art each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to claim 14 of Raman, Applicants respectfully note in response that what Raman at claim 14 in fact discloses is:

15. An interactive system for presenting source information, comprising:
 - a converter configured to convert electronically encoded data representing the source information to a common intermediate representation of the source information;
 - a presenter configured to convert the common intermediate representation into a presentation of the source information to a user;
 - an input device configured to enter user commands to select one or more of at least two modalities in which the source information is presentable; and
 - an interactive interface configured to receive a command entered on the input device and to issue a control signal representing the received command to the presentor, responsive to which the presenter controls the presentation of the source information in the selected one or more of the at least two modalities.

That is, Raman at claim 14 discloses an interactive system for presenting source information that includes an interactive interface for issuing control signals to a

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presenter based on input commands. Raman's interactive system for presenting source information that includes an interactive interface for issuing control signals to a presenter based on input commands is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at claim 14 does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document.' Because Raman does not place in the possession of a person of ordinary skilled in the art each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to claim 22 of Raman, Applicants respectfully note in response that what Raman at claim 22 in fact discloses is:

22. An interactive system according to claim 14, wherein:

- the input device includes a speech input unit;
- the at least two modalities include an aural presentation modality; and
- with the aural presentation modality selected, interactivity between the interactive system and the user is accomplished using only speech.

That is, Raman at claim 22 discloses an interactive system for presenting source information in which the interactivity is accomplished using speech. Raman's interactive system for presenting source information in which the interactivity is accomplished using speech is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element

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identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at claim 22 does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes a structural element identifier for at least one structural element of the structured document.' Because Raman does not place in the possession of a person of ordinary skilled in the art each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Relations Among Claims

Independent claim 1 is patentable for the reasons discussed above. Independent claims 9 and 17 claim system and computer program product aspects of the method claimed in independent claim 1. Independent claims 9 and 17 therefore are patentable for the same reasons that claim 1 is patentable as described above. Dependent claims 2-7, 10-15, and 18-23 depend from independent claims 1, 9, and 17 respectively. The dependent claims include each and every element and limitation of the independent claims from which they depend. The dependent claims stand because their respective independent claims stand. Claims 1-7, 9-15, and 17-23 are therefore patentable and should be allowed. Applicants respectfully traverse each rejection individually below and request reconsideration of claims 1-7, 9-15, and 17-23.

CLAIM REJECTIONS – 35 U.S.C. § 103

Claims 8, 16, and 24 stand rejected for obviousness under 35 U.S.C § 103(a) as being unpatentable over Raman in view of Josephson (U.S. Application Publication 2003/023435 A1). The rejections of claims 8, 16, and 24 rely on the previous 35 U.S.C. § 102 rejections arguing that Raman discloses each and every element and limitation of independent claims 1, 9, and 17. Applicants, however, have demonstrated above that Raman does not disclose each and every element of independent claims 1, 9, and 17.

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To establish a prima facie case of obviousness, the proposed combination of the references must teach or suggest all of the claim limitations of dependent claims 8, 16, and 24. *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974). Dependent claims 8, 16, and 24 depend from independent claims 1, 9, and 17 respectively and include all of the limitations of the claims from which they depend. Because the rejections under the proposed combination of Raman and Josephson rely on the argument that Raman teaches each and every element claims 1, 9, and 17, and because Raman in fact does not teach or suggest each and every element of claim 1, 9, and 17, the proposed combination cannot teach or suggest all the claim limitations of claims 8, 16, and 24. The proposed combination therefore cannot establish a prima facie case of obviousness, and the rejections should be withdrawn.

CONCLUSION

The Office Action objects to the drawings based on the assertion that two elements having the same names in a single view of the drawings cannot have different reference numbers. The law governing the objection in the Office Action, however, is 37 CFR § 1.84(p)(4). Because the drawings, in fact, comply with 37 CFR § 1.84(p)(4), Applicants traverse the objection to the drawings and decline to amend the drawings at this time.

Claims 1-7, 9-15, and 17-23 stand rejected under 35 U.S.C § 102(e) as being anticipated by Raman (U.S. Patent No. 5,748,186). For the reasons discussed above, Raman does not disclose each and every element of claims 1-7, 9-15, and 17-23 and Raman does not place one of skill in the art in possession of claim 1-7, 9-15, and 17-23. Raman therefore does not anticipate claims 1-7, 9-15, and 17-23 and the rejections should be withdrawn.

Claims 8, 16, and 24 stand rejected for obviousness under 35 U.S.C § 103(a) as being unpatentable over Raman in view of Josephson (U.S. Application Publication 2003/023435 A1). Because the proposed combination rely on the argument that Raman teaches each and every element claims 1, 9, and 17, and because Raman in fact does not

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teach or suggest each and every element of claim 1, 9, and 17, the proposed combination cannot teach or suggest all the claim limitations of claims 8, 16, and 24. The proposed combination therefore cannot establish a *prima facie case of obviousness* and the rejections should be withdrawn. Claims 1-24 are therefore patentable and should be allowed. Applicants respectfully traverse each rejection individually below and request reconsideration of claims 1-24.

The Commissioner is hereby authorized to charge or credit Deposit Account No. 09-0447 for any fees required or overpaid.

Respectfully submitted,

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